

EXHIBIT A

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

ESTATE OF GEORGE BERNARD WORRELL, JR.,)

Plaintiff)

v.)

THANG, INC., et al.,)

Defendant)

Civil Action No. 4:22-cv-11009-FKB-DRG

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Sony Music Entertainment c/o David Jacoby, 25 Madison Ave, New York, NY 10010

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See Attachment

Place: SCHENK & BRUETSCH, PLC 211 W. Fort St., Suite 1410 Detroit, MI 48226	Date and Time: Produce documents on or before January 24, 2024
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 1/9/2024

KINIKIA D. ESSIX, CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)
Defendants THANG, INC. and GEORGE CLINTON, who issues or requests this subpoena, are:

Peter E. Doyle (P81815), 211 W. Fort St., Ste. 1410, Detroit, MI 48226; 313-774-1000; peter.doyle@sbdetroit.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Subpoena to Sony Music Entertainment
Estate of Worrell v. Thang, Inc. et al, 4:22-cv-11009-FKB-DRG

ATTACHMENT TO SUBPOENA

Please produce the following for the years 2013 to present:

1. All royalty statements showing payments to any individual or entity for the musical recordings attached hereto as **Exhibit A**.

2. All income reports of any sort whatsoever submitted to any tax authority in the United States, including but not limited to, the Internal Revenue Service or state taxing authority, for:

- a. GEORGE CLINTON, his assignees or successors in interest;
- b. GEORGE BERNARD WORRELL, JR., his assignees, successors in interest, or his estate; and
- c. THANG, INC., its assignees or successors in interest.

3. All communications from representatives of SONY MUSIC ENTERTAINMENT and GEORGE BERNARD WORRELL, JR., JUDIE WORRELL, the ESTATE OF GEORGE BERNARD WORRELL, JR., and/or representatives thereof, pertaining in any way to:

- a. Any claims asserted in any copyrighted work;
- b. Any disputes involving the payment of royalties for copyrighted works; and/or
- c. Any matter involving the pending litigation between the Estate of Worrell v. Thang, Inc. et al, fully captioned above.

Subpoena to Sony Music Entertainment
Estate of Worrell v. Thang, Inc. et al, 4:22-cv-11009-FKB-DRG

4. All communications from representatives of SONY MUSIC ENTERTAINMENT by any individual or entity, pertaining in any way, to any claims asserted in any copyrighted work for which GEORGE CLINTON or THANG, INC. have received royalties for the period 2013 to present.

5. All contracts or agreements between SONY MUSIC ENTERTAINMENT (to include any predecessor, successor, affiliated entity, etc.) and THANG, INC. under which royalty payments, of any kind, have been made from 2013 to present.

6. All contracts or agreements between SONY MUSIC ENTERTAINMENT (to include any predecessor, successor, affiliated entity, etc.) and GEORGE CLINTON under which royalty payments, of any kind, have been made from 2013 to present.

DATED: January 9, 2024

Exhibit A

List of Musical Recordings

ALBUM	SONG TITLE
All The Woo In The World	Woo Together
All The Woo In The World	I'll Be With You
All The Woo In The World	Hold On
All The Woo In The World	Much Thrust
All The Woo In The World	Happy To Have (Happiness On Our Side)
All The Woo In The World	Insurance Man For The Funk
All The Woo In The World	Reprise: Much Thrust
America Eats Its Young	You Hit The Nail On The Head
America Eats Its Young	If You Don't Like The Effects, Don't Produce The Cause
America Eats Its Young	Everybody Is Going To Make It This Time
America Eats Its Young	A Joyful Process
America Eats Its Young	We Hurt Too
America Eats Its Young	Loose Booty
America Eats Its Young	Philmore
America Eats Its Young	Pussy
America Eats Its Young	America Eats Its Young
America Eats Its Young	Biological Speculation
America Eats Its Young	That Was My Girl
America Eats Its Young	Balance
America Eats Its Young	Miss Lucifer's Love
America Eats Its Young	Wake Up
Bootsy? Player of the Year	Bootsy? (What's The Name Of This Town)
Bootsy? Player of the Year	May The Force Be With You
Bootsy? Player of the Year	Very Yes
Bootsy? Player of the Year	Bootzilla
Bootsy? Player of the Year	Hollywood Squares
Bootsy? Player of the Year	Roto-Rooter
Bootsy? Player of the Year	As In (I Love You)
Chocolate City	Chocolate City
Chocolate City	Ride On
Chocolate City	Together
Chocolate City	Side Effects
Chocolate City	What Comes Funky
Chocolate City	Let Me Be
Chocolate City	If It Don't Fit (Don't Force It)
Chocolate City	I Misjudged You
Chocolate City	Big Footin'
Cosmic Slop	Nappy Dugout
Cosmic Slop	You Can't Miss What You Can't Measure
Cosmic Slop	March To The Witch's Castle
Cosmic Slop	Let's Make It Last
Cosmic Slop	Cosmic Slop
Cosmic Slop	No Compute
Cosmic Slop	This Broken Heart
Cosmic Slop	Trash-A-Go-Go

Cosmic Slop	Can't Stand The Strain
Finest	I'll Bet You
Finest	I Got A Thing, You Got A Thing, Everybody Got A Thing
Finest	Funky Dollar Bill
Finest	I Wanna Know If It's Good To You
Finest	Hit It & Quit It
Finest	You & Your Folks, Me & My Folks
Finest	A Joyful Process
Finest	Loose Booty
Finest	You Can't Miss What You Can't Measure
Finest	Cosmic Slop
Finest	Red Hot Mama
Finest	Standing On The Verge Of Getting It On
Finest	Let's Take It To The Stage
Finest	Get Off Your Ass & Jam
Finest	Undisco Kidd
Finest	Maggot Brain (Live)
Free Your Mind And Your Ass Will Follow	Free Your Mind And Your Ass Will Follow
Free Your Mind And Your Ass Will Follow	Friday Night, August 14th
Free Your Mind And Your Ass Will Follow	Funky Dollar Bill
Free Your Mind And Your Ass Will Follow	I Wanna Know If It's Good To You
Free Your Mind And Your Ass Will Follow	Some More
Free Your Mind And Your Ass Will Follow	Eulogy And Light
Funk Or Walk	Disco To Go
Funk Or Walk	War Ship Touchante
Funk Or Walk	Nappy
Funk Or Walk	Birdie
Funk Or Walk	Just Like You
Funk Or Walk	When You're Gone
Funk Or Walk	Amorous
Funkadelic	Mommy, What's A Funkadelic?
Funkadelic	I Bet You
Funkadelic	Music For My Mother
Funkadelic	I Got A Thing, You Got A Thing, Everybody's Got A Thing
Funkadelic	Good Old Music
Funkadelic	Qualify & Satisfy
Funkadelic	What Is Soul
Funkentelechy vs. The Placebo Syndrome	Bop Gun (Endangered Species)
Funkentelechy vs. The Placebo Syndrome	Sir Nose D'Voidoffunk (Pay Attention - B3M)
Funkentelechy vs. The Placebo Syndrome	Wizard Of Finance
Funkentelechy vs. The Placebo Syndrome	Funkentelechy
Funkentelechy vs. The Placebo Syndrome	Placebo Syndrome
Funkentelechy vs. The Placebo Syndrome	Flash Light
Game, Dames and Guitar Thangs	So Goes The Story
Game, Dames and Guitar Thangs	California Dreamin' (Reprise)
Game, Dames and Guitar Thangs	I Want You (She's So Heavy)

Game, Dames and Guitar Thangs	What About It?
Game, Dames and Guitar Thangs	Frantic Moment
Game, Dames and Guitar Thangs	Physical Love
Game, Dames and Guitar Thangs	California Dreamin'
Hardcore Jollies	Comin' Round The Mountain
Hardcore Jollies	Smokey
Hardcore Jollies	If You Got Funk, You Got Style
Hardcore Jollies	Hardcore Jollies
Hardcore Jollies	Soul Mate
Hardcore Jollies	Cosmic Slop (Live)
Hardcore Jollies	You Scared The Lovin' Outta Me
Hardcore Jollies	Adolescent Funk
Hit It And Quit It B Side	Whole Lot Of BS
Let's Take It To The Stage	Atmosphere
Let's Take It To The Stage	Be My Beach
Let's Take It To The Stage	Better By The Pound
Let's Take It To The Stage	Get Off Your Ass And Jam
Let's Take It To The Stage	Good To Your Earhole
Let's Take It To The Stage	I Owe You Something Good
Let's Take It To The Stage	Lead Guitar [Uncredited] – Paul Warren
Let's Take It To The Stage	Lead Guitar [Uncredited] – Paul Warren
Let's Take It To The Stage	Let's Take It To The Stage
Let's Take It To The Stage	No Head, No Backstage Pass
Let's Take It To The Stage	Stuffs & Things
Let's Take It To The Stage	The Song Is Familiar
Live (P. Funk Earth Tour)	P-Funk (Wants To Get Funked Up)
Live (P. Funk Earth Tour)	Children Of Production
Live (P. Funk Earth Tour)	Do That Stuff
Live (P. Funk Earth Tour)	Dr. Funkenstein
Live (P. Funk Earth Tour)	Dr. Funkenstein's Supergroovalisticprosifunkstication Medley
Live (P. Funk Earth Tour)	Fantasy Is Reality
Live (P. Funk Earth Tour)	Featuring, Vocals [Lead Snore] – Mike Hampton*
Live (P. Funk Earth Tour)	Featuring, Vocals [Lead Snore] – Mike Hampton*
Live (P. Funk Earth Tour)	Gamin' On Ya!
Live (P. Funk Earth Tour)	Get Off Your Ass And Jam
Live (P. Funk Earth Tour)	Give Up The Funk (Tear The Roof Off The Sucker)
Live (P. Funk Earth Tour)	Lead Vocals – Glen Goins
Live (P. Funk Earth Tour)	Lead Vocals – Glen Goins
Live (P. Funk Earth Tour)	Let's Take It To The Stage
Live (P. Funk Earth Tour)	Mothership Connection (Star Child)
Live (P. Funk Earth Tour)	Night Of The Thumpasorus People
Live (P. Funk Earth Tour)	Swing Down, Sweet Chariot
Live (P. Funk Earth Tour)	Take Your Dead Ass Home (Say Sam'n Nasty)
Live (P. Funk Earth Tour)	Tear The Roof Off The Sucker Medley
Live (P. Funk Earth Tour)	The Landing (Of The Holy Mothership)
Live (P. Funk Earth Tour)	The Undisco Kid (This Girl Is Bad!)

Live (P. Funk Earth Tour)	This Is The Way We Funk With You
Maggot Brain	Maggot Brain
Maggot Brain	Can You Get To That
Maggot Brain	Hit It And Quit It
Maggot Brain	You And Your Folks, Me And My Folks
Maggot Brain	Super Stupid
Maggot Brain	Back In Our Minds
Maggot Brain	Wars Of Armageddon
Mothership Connection	P. Funk (Wants To Get Funked Up)
Mothership Connection	Mothership Connection (Star Child)
Mothership Connection	Unfunky UFO
Mothership Connection	Supergroovalisticprosifunkstication
Mothership Connection	Handcuffs
Mothership Connection	Give Up The Funk (Tear The Roof Off The Sucker)
Mothership Connection	Night Of The Thumpasorus Peoples
Motor Booty Affair	Mr. Wiggles
Motor Booty Affair	Rumpofsteelskin
Motor Booty Affair	(You're A Fish And I'm A) Water Sign
Motor Booty Affair	Aqua Boogie (A Psychoalphadiscobetabioaquadoloop)
Motor Booty Affair	One Of Those Funky Things
Motor Booty Affair	Liquid Sunshine
Motor Booty Affair	The Motor-Booty Affair
Motor Booty Affair	Deep
One Nation Under A Groove	One Nation Under A Groove
One Nation Under A Groove	Groovallegiance
One Nation Under A Groove	Who Says A Funk Band Can't Play Rock?!
One Nation Under A Groove	Promentalshitbackwashpsychosis Enema Squad (The Doo Doo Chasers)
One Nation Under A Groove	Into You
One Nation Under A Groove	Cholly (Funk Getting Ready To Roll!)
One Nation Under A Groove	Maggot Brain
One Nation Under A Groove	Chant (Think It Ain't Illegal Yet!)
One Nation Under A Groove	Lunchmeataphobia (Think! It Ain't Illegal Yet!)
One Nation Under A Groove	P.E. Squad / Doo Doo Chasers
Osmium	I Call My Baby Pussycat
Osmium	Put Love In Your Life
Osmium	Little Ole Country Boy
Osmium	Moonshine Heather
Osmium	Oh Lord, Why Lord / Prayer
Osmium	My Automobile
Osmium	Nothing Before Me But Thang
Osmium	Funky Woman
Osmium	Livin' The Life
Osmium	The Silent Boatman
Pleasure Principle	Pleasure Principle
Pleasure Principle	Love Amnesia
Pleasure Principle	Cookie Jar

Pleasure Principle	Misunderstanding
Pleasure Principle	Are You Dreaming?
Pleasure Principle	Mr. Melody Man
Standing On The Verge Of Getting It On	Red Hot Mama
Standing On The Verge Of Getting It On	Alice In My Fantasies
Standing On The Verge Of Getting It On	I'll Stay
Standing On The Verge Of Getting It On	Sexy Ways
Standing On The Verge Of Getting It On	Standing On The Verge Of Getting It On
Standing On The Verge Of Getting It On	Jimmy's Got A Little Bit Of Bitch In Him
Standing On The Verge Of Getting It On	Good Thoughts, Bad Thoughts
Stretchin Out In Bootsy's Rubber Band	Stretchin' Out (In A Rubber Band)
Stretchin Out In Bootsy's Rubber Band	Psychoticbumpschool
Stretchin Out In Bootsy's Rubber Band	Another Point Of View
Stretchin Out In Bootsy's Rubber Band	I'd Rather Be With You
Stretchin Out In Bootsy's Rubber Band	Love Vibes
Stretchin Out In Bootsy's Rubber Band	Physical Love
Stretchin Out In Bootsy's Rubber Band	Vanish In Our Sleep
Tales of Kidd Funkadelic	Butt-To-Buttresuscitation
Tales of Kidd Funkadelic	Let's Take It To The People
Tales of Kidd Funkadelic	Undisco Kidd
Tales of Kidd Funkadelic	Take Your Dead Ass Home! (Say Som'n Nasty)
Tales of Kidd Funkadelic	I'm Never Gonna Tell It
Tales of Kidd Funkadelic	Tales Of Kidd Funkadelic (Opusdelite Years)
Tales of Kidd Funkadelic	How Do Yeaw View You?
The Clones of Dr. Funkenstein	Prelude
The Clones of Dr. Funkenstein	Gamin' On Ya
The Clones of Dr. Funkenstein	Dr. Funkenstein
The Clones of Dr. Funkenstein	Children Of Production
The Clones of Dr. Funkenstein	Getten' To Know You
The Clones of Dr. Funkenstein	Do That Stuff
The Clones of Dr. Funkenstein	Everything Is On The One
The Clones of Dr. Funkenstein	I've Been Watching You (Move Your Sexy Body)
The Clones of Dr. Funkenstein	Funkin' For Fun
The Electric Spanking of War Babies	Electro-Cuties
The Electric Spanking of War Babies	Funk Gets Stronger (Part I)
The Electric Spanking of War Babies	Brettino's Bounce
The Electric Spanking of War Babies	Funk Gets Stronger (Killer Millimeter Longer Version)
The Electric Spanking of War Babies	She Loves You
The Electric Spanking of War Babies	Shockwaves
The Electric Spanking of War Babies	Oh, I
The Electric Spanking of War Babies	Icka Prick
The Electric Spanking of War Babies	The Electric Spanking Of War Babies
This Boot Is Made For Fonk-n	Under The Influence Of A Groove
This Boot Is Made For Fonk-n	Bootsy Get Live
This Boot Is Made For Fonk-n	Oh Boy Gorl
This Boot Is Made For Fonk-n	Jam Fan (Hot)

This Boot Is Made For Fonk-n	Chug-A-Lug (The Bun Patrol)
This Boot Is Made For Fonk-n	Shejam (Almost Bootsy Show)
This Boot Is Made For Fonk-n	Reprise (Get Live)
Toys	Heart Trouble AKA You Can't Miss What You Can't Measure
Toys	The Goose That Laid The Golden Egg
Toys	Vampy Funky Bernie (3rd Tune Olympic)
Toys	Talk About Jesus
Toys	Slide On In (2nd Tune Olympic)
Toys	Stink Finger
Toys	Magnifunk
Toys	Wars Of Armageddon (Karaoke Version)
Toys	2 Dollars & 2 Dimes
Toys	Cosmic Slop
Trombipulation	Crush It
Trombipulation	Trombipulation
Trombipulation	Long Way Around
Trombipulation	Agony Of Defeat
Trombipulation	New Doo Review
Trombipulation	Let's Play House
Trombipulation	Body Language
Trombipulation	Peek-A-Groove
Uncle Jam Wants You	Freak Of The Week
Uncle Jam Wants You	(Not Just) Knee Deep
Uncle Jam Wants You	Uncle Jam
Uncle Jam Wants You	Field Maneuvers
Uncle Jam Wants You	Holly Wants To Go To California
Uncle Jam Wants You	Foot Soldiers (Star-Spangled Funky)
Up For The Down Stroke	Up For The Down Stroke
Up For The Down Stroke	Testify
Up For The Down Stroke	The Goose
Up For The Down Stroke	I Can Move You (If You Let Me)
Up For The Down Stroke	I Just Got Back (From The Fantasy: Ahead Of Our Time In The Four Lands Of Ellet)
Up For The Down Stroke	All Your Goodies Are Gone
Up For The Down Stroke	Whatever Makes Baby Feel Good
Up For The Down Stroke	Presence Of A Brain

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ESTATE OF GEORGE BERNARD
WORRELL, JR.,

Plaintiff,

v.

THANG, INC., GEORGE CLINTON,
AND SOUND EXCHANGE, INC.

Defendants.

Case No. 4:22-cv-11009

District Judge F. Kay Behm

Magistrate Judge David R. Grand

DANIEL D. QUICK (P48109)
Dickinson Wright PLLC
2600 W. Big Beaver Road
Suite 300
Troy, MI 48084
(248) 433-7200
dquick@dickinsonwright.com
Attorneys for Plaintiff

JAMES P. ALLEN, SR. (P52885)
PETER E. DOYLE (P81815)
Schenk & Bruetsch PLC
211 W. Fort St., Suite 1410
(313) 774-1000
james.allen@sbdetroit.com
peter.doyle@sbdetroit.com
*Attorneys for Defendants Thang, Inc. &
George Clinton*

DAVID E. PLUNKETT (P66696)
Williams, Williams, Rattner &
Plunkett, P.C.
380 N. Old Woodward Avenue
Birmingham, MI 48009
(248) 642-0333 // Fax (248) 642-0856
dep@wwrplaw.com

BARRY I. SLOTNICK
JORDAN A. MEDDY
Loeb & Loeb LLP
345 Park Avenue
New York, NY 10154
(212) 407-4000
bslotnick@loeb.com
jmeddy@loeb.com
*Attorneys for Defendant
SoundExchange, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2024, I served a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil

Action, via First Class Mail and Email to Sony Music, c/o David Jacoby and provided notice to all counsel of record via Email and First Class Mail.

/s/Veronica Sanford
Veronica Sanford
Schenk & Bruetsch, PLC